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USDOC FOR 532/OEA/MNICKSON /DMUSLU
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS
SINGAPORE FOR FCS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [ETRD](#) [ETTC](#) [HK](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION:
MICRO-COMM ASSOCIATES PTE LTD
REF: A) USDOC 01394

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Regional Export Control Officer Philip Ankel (ECO) conducted a post shipment-verification (PSV) at Micro-Comm Associates Pte. Ltd., No. 10 Ubi Crescent, Singapore (Micro-Comm). The items in question are 62 ADC-30720 A/D converters exported to Micro-Comm on or about November 6, 2007 and November 12, 2007. The items are classified under Export Control Classification Number (ECCN) 3A001 and are controlled for national security (NS) reasons. The exporter was Mesa MW Corporation of Gilbert Arizona.

¶3. According to the Singapore companies registry, Micro-Comm was registered in 1999 and its registered share capital is the Singapore dollar equivalent of approximately USD 180,000. Its directors are Indian Nationals Rajesh Mishra, Satya Prakash Mishra, Singapore Permanent Resident Shukla Sunita and Singapore citizen Rm Muthaiah. Rajesh Mishra, Satya Prakash Mishra and Shukla Sunita are also the shareholders of the company.

¶4. A review of the company's web site (www.microcommassociates.com) reveals that the company is primarily a electronics components reseller.

¶5. On April 22, 2008, the ECO, accompanied by a representative of Singapore Customs visited the company and met with Ms. Sunita Shukla, Director and S.P. Mishra, Director. Mr. Mishra provided a business card listing him as the Regional Vice President of the Indo-American Chamber of Commerce and another card listing him as the Managing Director of Kaytronics Exim Pvt. Ltd. in Bangalore (Kaytronics). Mr. Mishra was quick to point out to the ECO that he has attended several BIS events in India where quite senior representatives of BIS had participated including Under Secretaries Juster and Mancuso as well as Office Director, Steve Goldman. He stated that he is well aware of U.S. export controls and was actively working in India to improve U.S. - India relations. He also informed the ECO that this was the second PSV that this company had received from BIS and that he had previously been visited by Special Agents Holzer and Higgins in 2005.

¶6. Mr. Mishra also provided the ECO with additional information about the various companies that are affiliated with Micro-Comm and Kaytronics. In particular, Kaytronics (www.kayindia.com) is the parent company of Micro-Comm in Singapore and the exporter, Mesa Microwave, in Arizona (Mesa). All companies are disclosed at the Kaytronics web site. Mesa acts as the procurement mechanism for Kaytronics (it was previously named Kaytronics) and Micro-Comm. Mr. Mishra was quick to stress that all of his customers know the destination of the items in question. He has set up this type of

structure to allow him to procure and pay for items in the United States that he can subsequently ship through Singapore. His niche is in providing various products to Indian state entities and obtaining payment for those items (the mechanics of which can be quite complicated). Total turnover for all of the companies was approximately USD 5 million in 2006.

¶17. As to the particular items in question, Mr. Mishra stated that those items had been procured on behalf of Bharat Electronics for use in communications equipment for the Indian military (electronic countermeasures). Mr. Mishra stated that he knows this customer well and that it is not involved in missile or nuclear related programs. He further stated that the items in question are quite old and obsolete. He noted that the Indian military often continues to use older equipment and therefore requires such older/obsolete components. Mr. Mishra provided the ECO with tax invoices (with original stamp of Bharat Electronics) indicating delivery, on November 14, 2007, of the 62 converters that are the subject of this PSV. Those converters were delivered to the representative office of Bharat Electronics in Singapore.

¶18. Mr. Mishra stated that he occasionally receives orders for shipment to China. Typically, he stated, when he requests End-use/user statements from those purported buyers, further correspondence ceases.

¶19. At the time visited, Micro-Comm appeared to be a suitable recipient of the commodities shipped since Micro-Comm cooperated with the PSV, provided ECO with access to documents showing final disposition of the items and operates a line of business consistent with the use of the items. Also, Micro-Comm is quite familiar with U.S. export controls and expressed its commitment to comply with them.